



# California Fair Political Practices Commission

March 26, 1986

Rozellah Ryan, Staff Counsel  
Department of Corrections  
630 K Street  
Sacramento, CA 95814

Re: FPFC Advice No. A-86-066

Dear Ms. Ryan:

Thank you for your memorandum of February 24, 1986, which confirmed our telephone discussion of February 20, 1986, regarding gift reporting pursuant to Government Code Section 87207.

Your memorandum correctly states my advice that when an official receives a gift valued at \$50 or more, the gift must be reported on the official's Statement of Economic Interests even if several donors provided the gift and each of them paid less than \$50. However, in such a situation, the official is not required to disclose the name of each donor, but may refer to the donors as a group, such as, "A group of my friends and co-workers, each of whom paid less than \$50."

If an official receives a gift from more than one donor and some or all of the donors have paid \$50 or more toward the gift, the official may refer to the donors as a group, but must also provide in an attachment the name of each donor who paid \$50 or more and the amount paid by the donor. (See FPFC regulation 2 Cal. Adm. Code Section 18726.6, copy enclosed.)

I hope this additional information is helpful. Please call me at (916) 322-5662 if I can be of further assistance.

Sincerely,

*Carla Wardlow*

Carla Wardlow  
Political Reform Consultant

Enclosure

## Memorandum

Date : February 24, 1986

FEB 25 8 46 AM '86

To : CARLA WARDLOW  
Fair Political Practices Commission  
1100 K Street, P. O. Box 807  
Sacramento, CA 95804

From : Department of Corrections, Sacramento 95814

Subject: GOVERNMENT CODE §87207

The purpose of this memo is to confirm in writing our telephone discussion on February 20. During that discussion I asked for the FPPC interpretation of the reporting requirement in Government Code §87207. The statute requires that the source of gifts of \$50 or more be reported. I asked whether the individual donor must give a cumulative gift of \$50 or whether all donors, including those giving less than \$50 gifts, must be reported if the official has received a total of \$50 in gifts during the reporting period.

It is my understanding that you have stated that FPPC requires that only those donors who have given gifts of \$50 need be reported. The exception is if the numerous donors, whose individual gifts are under \$50, are part of a group so as to be considered a single donor for purposes of FPPC. In such a case, all donors would need to be reported.

Thank you for your assistance.

  
ROZELLAH RYAN  
Staff Counsel



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February 26, 1986

Rozellah Ryan  
Staff Counsel  
Department of Corrections  
630 K Street  
Sacramento, CA 95814

Re: A-86-066

Dear Ms. Ryan:

Your letter requesting advice under the Political Reform Act has been received by the Fair Political Practices Commission. If you have any questions about your advice request, you may contact the Technical Assistance and Analysis Division at (916) 322-5662.

We try to answer all advice requests promptly. Therefore, unless your request poses particularly complex legal questions, or unless more information is needed to answer your request, you should expect a response within 21 working days.

Very truly yours,

Jeanne Pritchard  
Chief  
Technical Assistance and Analysis  
Division

JP:plh